

REMARKS/ARGUMENTS

Reconsideration of this application is requested. Claims 11-20 are in the case.

I. THE OBVIOUSNESS REJECTION

Claims 11-14 and 16-20 stand rejected under 35 USC §103(a) as allegedly unpatentable over 2002/0079106 to Simpson in view of US patent 6,17,351 to Shroder et al. That rejection is respectfully traversed.

As claimed, the invention provides a method for connecting a first tubular element and a second tubular element. The method comprises locating a portion of the first tubular element within a portion of the second tubular element, and expanding the portion of the first tubular element and/or compressing the portion of the second tubular element to form a connection resulting from the interference between the external surface of the portion of the first tubular element and the internal surface of the portion of the second tubular element. Prior to assembly, one or both of the external surface of the portion of the first tubular element and the internal surface of the portion of the second tubular element is/are at least partially coated with hard angular material, wherein the hard angular material is applied to the external surface of the portion of the first tubular element and/or the internal surface of the portion of the second tubular element by plasma spraying to form protuberances on the surface.

Simpson fails to suggest the use of plasma coating to apply a hard particulate material to form protuberances on the surface. The Action relies on Shroder as suggesting that plasma spraying using a mask to form protuberances has been

employed for the same purpose in a similar method of connecting two separate tubular elements. This position is respectfully traversed.

It has been discovered, according to the present invention, that particularly good connections can be formed by plasma spraying the external surface of the portion of the first tubular element to form protuberances on the surface. As noted above, Simpson does not suggest plasma coating to apply a hard particulate material nor its application to form protuberances on the surface. Shroder does not cure this deficiency.

Shroder discloses the application of a ceramic coating by thermal spraying, i.e. flame spraying or plasma spraying, through a perforated mask. However, it would not have been obvious to one of ordinary skill in the art at the time the invention was made to have combined Shroder and Simpson, since there is nothing in Simpson which suggests the use of a mask. Thus, one of ordinary skill would not have been motivated to use a mask technique as disclosed by Shroder to apply an adherent coating on the first tubular element of Simpson.

Shroder addresses technical problems associated with strip coatings for metal components of drive units. The profiled strip coating applied to a metal component of a drive unit abrades an abradable coating during a stripping operation. Far from creating a connection between the two components of the drive unit, it is an objective of the process disclosed by Shroder to form a uniform gap between the abraded coating and the abrasive coating (see, column 1, lines 54-59). Thus, the coating process of Shroder is clearly not "for the same purpose in a similar method of connecting two separate tubular elements", as alleged in the Action.

As Simpson contains no suggestion of using plasma spraying to form protuberances, and since Shroder fails to suggest that it would be useful or even appropriate to use a mask to improve the connection between tubular elements such as pipe for strings to be used in oil and gas wells, it is believed that one of ordinary skill would not have been motivated to combine Simpson and Shroder. As there is no technical connection between Simpson and Shroder, it is clear that these cited references are not combinable, and that the rejection is based on hindsight, which is not a proper basis for rejection.

Absent any motivation to combine the cited references, no *prima facie* case of obviousness has been generated in this case. Withdrawal of the obviousness rejection is respectfully requested.

II. CLAIM AMENDMENTS

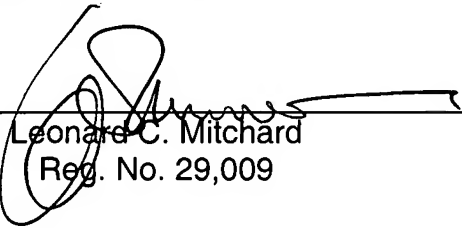
Minor amendments have been effected to improve the form of the claims. No new matter is entered.

Favorable action is awaited.

Respectfully submitted,

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By: _____


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